

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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|--------------------------|---|--------------------------------|
| SAMSUNG ELECTRONICS CO., | ) |                                |
|                          | ) |                                |
| Plaintiff,               | ) |                                |
|                          | ) |                                |
| v.                       | ) | CIVIL ACTION NO. 3:14cv757-REP |
|                          | ) |                                |
| NVIDIA CORPORATION,      | ) |                                |
|                          | ) |                                |
| Defendant.               | ) |                                |
|                          | ) |                                |
|                          | ) |                                |

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**NVIDIA’S MOTION FOR  
JUDGMENT AS A MATTER OF LAW PURSUANT TO FED. R. CIV. P. 50  
THAT SAMSUNG HAS FAILED TO PROVE INFRINGEMENT OF THE  
THE ’602 PATENT**

Defendant NVIDIA Corporation (“NVIDIA”) respectfully moves for judgment as a matter of law under Rule 50(a) of the Federal Rules of Civil Procedure. At the close of Plaintiff Samsung Electronics Co., Ltd.’s (“Samsung”) case-in-chief, no reasonable jury would have a legally sufficient evidentiary basis to find for Samsung on the issue of infringement of U.S. Patent No. 6,819,602 (“the ’602 patent”). The grounds for this motion are set forth in NVIDIA’s Memorandum in Support of Motion for Judgment as a Matter of Law pursuant to Fed. R. Civ. P. 50 that Samsung Has Failed to Prove Infringement of the ’602 Patent, which is filed herewith.

NVIDIA respectfully requests that the Court enter judgment as a matter of law that the ’602 patent is not infringed.

Dated: February 5, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of February, 2016, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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